SUMMARY OF STATE BURDEN REDUCTION RECOMMENDATIONS AND EPA COMMENTS

PROGRAM: Water

Reporting Requirement	State Recommendation	States	Regional Comments	Office of Water Comments
Biennial reporting on state water quality and provision of lists of impaired waters pursuant to CWA S. 305(b) and 303(d)	--Change reporting frequency from 2 to 5 years --Offset reporting period by one or two cycles (2-4 years) from current cycle --Frequency should be changed to once every four years with interim report every two years (WI) --Reduce frequency to once/4 years --Change from 2 year to 20% per year with complete list every 5 yrs; do 303d list every 2 years w/timely regional approval (MS, TN)(1) --Allow states to keep 303d & 305b separate: integration of the two is burdensome (MS)(2) --Change from biennial to 3- or 4-year cycle --Change cycle from 2 to 4 years --EPA should develop listing criteria separate from the standards that are not as burdensome (UT)	MD, DE, NV, MI, IL, NY, OH ME, TN, VA, VT, MS, NV, NJ, CO, SD, ASIWPCA, WI, MN, AR, MT, UT, OK	**R1:** despite statutory requirements recommends IR national workgroup to streamline reporting (see R1 comments—ME) **R2:** agrees w/5-yr reporting cycle, if possible and if consistent w/CWA. **R3:** disagrees w/4- and 5-yr reporting cycle, neutral on 3 years **R4:** agrees w/MS & TN (1); disagrees w/MS (2) **R5:** agrees w/ IL, MI, MN, OH but notes preferred cycle inconsistent w/CWA; instead, recommends WI approach which may be consistent w/CWA. **R6:** agrees that reporting is too frequent, but biennial reporting is a statutory requirement and EPA does not have the authority to accept reports on a less frequent basis.	--Although EPA is unable to address states' concerns regarding statutory deadlines that dictate the current frequency of required reporting, we are sensitive to the concerns that the states have raised. To ensure that we continue to facilitate state reporting and to be responsive to individual state concerns as they arise, we will be forming a small workgroup of interested states and EPA representatives to discuss these issues further, beginning at the ASIWPCA spring meeting in March. --It is important to note that, aside from being a statutory requirement, water quality status reporting provides the fundamental data necessary to establish baselines and track trends in water quality; these reports enable states and EPA to track progress against critical water quality goals in the EPA Strategic Plan and the PART. EPA's commitment to working with States on this issue is demonstrated in such actions as the automation of reports using the Assessment Database so that states can electronically submit their water quality reports and track changes over time, and making allowances for states to combine two Section 303(d) listing cycles to respond to such circumstances as third party litigation. --EPA will work with regions and states to determine if there are additional steps we can take to ease state burdens.
SDWIS	-- Re public water compliance report, strategic performance measures, FY07 grants linked to performance, SNC list	MT, TN, MA, TX,	**R1:** MA (1) disagrees, reports are valuable; (2) disagrees, states need to verify data; (3) agrees; (4) disagrees; (5)	--EPA will work to eliminate duplicative reporting wherever possible. --SDWIS/Fed should be modified to create reports for:

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	annotation: modify SDWIS-fed to extract this data from SDWIS-state (MT)(1) --Incidental requests for info/data not available in SDWIS-fed: modify it so that necessary info can be extracted from SDWIS-state (MT)(2) --Submission of Public Water System Inventory data from SDWIS-state to EPA's ODS. Only changes or modifications of required data elements should be submitted to EPA (TN) --Reporting drinking water program info in SDWIS. There are too many databases—should all be consolidated into one: SDWIS (TN) --Monthly deliverables of inventory data, chemical data, technical assistance, reports, letters, etc. Must present deliverables to EPA in hard copy. Track all info electronically via SDWIS-state instead --SNC report developed for capacity development—delete, redundant (FL)(1) --Eliminate requirement for plan to conduct all sanitary surveys for the fiscal year –any info EPA needs is already in SDWIS	FL, IA, SC	doesn't understand comment; (6) doesn't know if SDWIS can accommodate this request; (7) doesn't know if SDWIS can accommodate this request. **R4:** disagrees w/(FL)(1), no other source of info; not familiar w/requirement for plan (FL)(2) --agrees w/SC as long as this info is in SDWIS **R6:** (1) agrees w/TX to improve data quality **R7:** disagrees, there are database problems but see comments **R8:** disagrees w/(MT)(1) re SNC list annotation b/c of problematic past history; no comments on rest of list; supports (MT)(2).	(1) Public water compliance (MT); (2) Significant Noncompliance(SNC) list annotation (MT); (3) SNC report for capacity development reporting for new systems (TX, FL, MT); (4) Strategic performance measures (MA,MT); (5) FY07 grants linked to performance (state grant template) (MT). Response: (1-4) SDWIS/Fed modernization (completed in 2005) allows any state with web access to create various reports, including the SNC annotation list, and discuss the results with the regional offices. (2-3) HQ already generates the capacity development and significant non-compliance report every three years for the states to relieve some of the burden. (4-5) EPA already uses the data in SDWIS/FED to determine the accomplishment of measures and targets. --SDWIS/State: (1) EPA should develop electronic reporting mechanism for non-compliance in SDWIS-state (MT). (2) Automate and include in SDWIS reporting of operator certification program currently required annually in narrative report (MT). Response: (1) EPA has offered (through the regions) to generate the capacity development report for new systems and non-compliance reports. To date, only one state has asked EPA to do so. (2) SDWIS is the mechanism for data collection of reporting requirements which are part of state Public Water System Supervision (PWSS) Program primacy under 40 CFR 142. Operator Certification is a separate program established under the Safe Drinking Water Act (SDWA). Operator Certification Program reporting requires EPA to capture narrative information (i.e., more involved than providing

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	(FL)(2) --Capacity development/significant non-compliance (SNC) report. Provide SNC determinations via SDWIS-state to perform data QC before R6 requests this report (TX)(1) --Presenting monthly PWSSP deliverables to EPA in hard copy is burdensome (inventory and chemical data, etc.). Recommends tracking info via SDWIS-state (TX(2) --MA: (1) strategic plan measures and target data already reported in SDWIS. EPA should use this data for evaluation --(2) states shouldn't be asked to re-verify data in SDWIS --(3) report sanitary survey data in SDWIS only (now reported in SDWIS and ICIS—redundant) --(4) EPA should generate capacity development reporting for new systems w/SNCs instead of states --(5) EPA should develop electronic reporting mechanism for non-compliance in SDWIS-state and fed --(6) automate and include in SDWIS reporting of operator certification program currently			a data point such as a sample value or violation) and thus is not amenable to SDWIS reporting. --Verification of data: (1) States shouldn't be asked to re-verify data in SDWIS (MT). (2) EPA should fix SDWIS to eliminate the step for states to correct and send back PWS quarterly non-compliance reports (IA). Response: (1) SDWIS does not require data re-verification as part of the reporting process. OW efforts that do ask for re-verification of data already submitted (such as when EPA conducts a survey of water systems as is done for the Infrastructure Needs Survey required under SDWA Section 1452; data verification audits to determine SDWIS data quality; or unregulated contaminant monitoring of a representative set of small systems to meet requirements under SDWA Section 1445) are relatively infrequent. (2) In 2006, OW completed modernization of SDWIS/Fed which should have addressed state correction of PWS quarterly non-compliance reports. OW will check with the regional offices to determine whether this is still an issue and, if so, the best way to resolve it. --Reporting drinking water program information: (1) Monthly deliverables of inventory data, chemical data, technical assistance, reports, letters, etc. Must present deliverables to EPA in hard copy. Track all info electronically via SDWIS-state instead (TX). (2) Arsenic rule compliance reporting should occur once a year instead of quarterly (IL). (3) Database reporting of all drinking water program data should occur in SDWIS, all other database should be consolidated into SDWIS (Stage2/LT2, Source Water Protection, and UIC) (TN,

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	required annually in narrative report --(7) reporting of data should occur in SDWIS and other databases should be incorporated w/in SDWIS --Must correct and send back to EPA PWS quarterly non-compliance reports: EPA should fix database (IA) --Drinking water enforcement NOVs, orders, penalties assessed/collected, warning letters: eliminate as info is in SDWIS (SC)			MT). (4) Submission of Public Water System Inventory data from SDWIS-state to EPA from states should only include changes or modifications of required data elements and should not be sent as one file (TN). (5) Eliminate reporting requirement for planned sanitary surveys for the fiscal year–any info EPA needs is already in SDWIS (FL). (6) Incidental requests for information or data not available in SDWIS-fed so that it can be extracted from SDWIS-state (MT). Response: (1) While electronic reporting is available through SDWIS for inventory data, chemical data, technical assistance, reports, letters, etc., such reporting may not always be required (note that inventory data is always required). For instance, reporting is optional in situations that do not involve formal enforcement action. Certain Regional offices may request hard copy reporting. (2) Arsenic compliance reporting has been reduced from quarterly to twice a year. (3)(a) EPA intends to modify SDWIS to make it the primary repository for all drinking water violations data, including Stage2/LT2 results. Until SDWIS modules are fully developed, the Stage2/LT2 database (DCTS) will remain the primary means for reporting and tracking LT2 and Stage 2 information. Once modifications to SDWIS are complete the information from DCTS will be migrated to SDWIS. This is planned to be near or fully completed in 2007. (b) The Source Water program is not requiring database reporting or developing a database at this time. (c) The option to use SDWIS to collect UIC inventory and violation data was explored during the development of the UIC data system, however, the program office determined that because the UIC database is centered on the individual wells and key

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				features of compliance are focused on the operation of wells, and SDWIS is focused on water treatment and delivery of drinking water systems, combining the two systems was not the best option since the inventory of facilities and the violations are significantly different. (4) OW's understanding is that total replace practice (submission of one file that contains all of the information for a state) is helpful for most states. The current practice of total replace was implemented for a number of reasons: (a) States using SDWIS/State extract necessary data for submission using the SDWIS/FedRep application (provided by EPA). (b) Total replacement enables States to perform SDWIS/FedRep validations to receive timely feedback on data submission errors. (c) Current technology allows the efficient transfers of large files and eliminates the burden on the State of having to determine which files have already been submitted. (5) We do not have a national requirement for reporting plans to conduct all sanitary surveys for the fiscal year to SDWIS/Fed. Regions may, however, request this information for work plan development and to support the development of targets for SDW-1 (FY 2007) "*Percent of community water systems and number of Tribal systems that have undergone a sanitary survey within three years of their last sanitary survey (five years for outstanding performers) as required under the Interim Enhanced and Long-Term 1 Surface Water Treatment Rules.*" (6) N/C, but see comments on SDWIS/state and SDWIS/fed above. --Enforcement and Compliance Reporting: (1) Report sanitary survey data to SDWIS only (now reported in SDWIS and ICIS—redundant) (MT). (2) Drinking water enforcement NOVs, orders, penalties

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				assessed/collected, warning letters: eliminate as info is in SDWIS (SC). Response: (1) States currently do not have to report information to ICIS and reporting sanitary survey information to SDWIS is voluntary. Reporting of sanitary surveys is being discussed with OECA (owner of ICIS). (2) States currently do not have to report information to ICIS. OW will consult with OECA about reporting enforcement NOVs, orders, penalties assessed/collected, warning letters, etc. to determine whether duplicative reporting exists and if so how best to address it.
UIC reports	--Eliminate UIC measures report and quarterly 7520 forms as info not compatible with ME's UIC database. 7520 form info is reported annually in PPA report. Grant is included in PPG but must be reported separately (ME) --Under UIC program, must provide info on specific well types (quarterly and annually). Eliminate, too burdensome (MA) --Quarterly reports for UIC	ME, MA, RI, TX, MD, AR, CT, UT	**R1:** --disagrees w/MA --agrees w/ME but HQ must make changes --supports RI but HQ must make changes --supports CT but HQ must make changes **R3:** once the national system is on-line, we should be able to pull all reports from the system. **R6:** --agrees w/TX on 1 &4, disagrees w/TX on 2 & 3	--Agrees that the UIC program needs one schedule/system for reporting and are developing a national database with one schedule which is expected to be deployed in late 2007. --EPA will provide a reporting schedule for reporting on the 7520 forms 1, 2A, 2B, 3 and 4; the UIC measures; and the inventory. This schedule will eventually be replaced with a schedule for submitting information to the national database. --Some states have been receiving Network Exchange Grants to develop electronic state data system for transferring UIC data to EPA to reduce reporting burden. We encourage states to apply for these grants to assist in

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	program: change to annual and incorporate report into PPA annual report (RI) --UIC program reports limited to those in UIC regs; develop single reporting system and schedule (TX)(1) --Discontinue UIC well inventory requirement as a separate report to EPA. Regulations specify that updated well inventory is a part of annual report (TX)(2) --Change UIC report frequency to annual from quarterly (TX)(3) --Base PAMs and other reporting requirements in UIC regulations and develop single reporting system and schedule (TX)(4) --PAMs for UIC program are duplicative of requirements of UIC program 7520 forms (AR) --Change UIC report frequency from semi-annual to annual (CT) --Class V Inventory data collection is costly, need more funds from EPA (UT)		--agrees w/AR that form 7520 should be streamlined **R8:** agrees w/UT's concern	the cost of changing from paper to electronic reporting. --The annual report for a PPA/PPG does not contain all of the reporting requirements for the UIC annual report. OGD sets the requirements for PPA/PPGs and the UIC requirements are set by the program through the UIC regulations and guidance.
319 grant reporting	--Nitrogen, phosphorus and sediment reduction estimates & actual reduction measurements: modeling estimated reductions not useful and actual reductions can't be well documented	MT, MN, MD, MA, IN	**R1:** semi-annual reporting is a one-time effort due to DA request. **R3:** GRTS will be upgraded to enable XML imports,	--N, P and sediment estimates and measurements are PART commitments to OMB that EPA adopted after conferring for a year with states and discussing the issue at meetings around the country. States and EPA agreed that load reduction reporting requirements were the best measure of NPS program performance short of the long-

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	--Annual financial status reports on 319 grants. Recommends issuance of guidance regarding the level necessary for meeting the reporting requirements --Regional requests beyond grant requirements, semi-annual reporting and dual electronic/written reporting. Recommends: regions should eliminate reporting not required by grants; annual not semi-annual reports; EPA shouldn't request info already in Grant Reporting and Tracking System (GRTS) (MN) --319 GRTS should be modified to allow data to be uploaded from spreadsheet, database or text file in addition to manual entry (MD) --Change reporting frequency from semi-annual to annual for mid-year GRTS report on 319 implementation projects (MA) --Change schedule from quarterly to annually for watershed sec. 319 (h) reporting (IN)		including spreadsheets but cannot upload files with images due to limited storage space on server. **R5: --**disagrees w/ IN; recommends retaining semi-annual 319 and annual nonpoint source reports --disagrees w/MN; recommends retaining reporting but, in the event national database systems are unavailable, that regional reporting to HQ be postponed.	term goal of achieving water quality standards. This commitment was a significant basis for OMB's "acceptable" rating for the 319 program. Although load reduction models are imperfect, they are used regularly by state agencies, USDA, and EPA for a variety of purposes (e.g., TMDL development and project planning) and EPA believes they are adequate for this purpose. --Need guidance on FSRs: Comment unclear. FSRs are similar in 319 to other EPA programs that require FSRs. --Streamline regional reporting requirements (MN, MA, IN): EPA does not specify national reporting frequency beyond requirements in Part 35 grant regulations. Regions have discretion to require additional or more frequent reporting as the Region deems appropriate. EPA agrees that information submitted to GRTS should not need to be separately submitted through other means, except as summarized in an annual report under Section 319(h)(11). --EPA shouldn't request info already in GRTS (MN): Our current program guidance for the Section 319 program already provides that states may use GRTS to report such items as the statutorily required annual reports. Moreover, EPA uses GRTS to extract and compute national load reduction figures for reporting under both OMB PART and the EPA Strategic Plan; states are not required to separately report this information once it has been entered into GRTS. If any other potential areas of duplication are identified, we would be pleased to work with the states to address those areas. --Modify GRTS to accept data from spreadsheet,

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				database or text file (MD): EPA agrees and is in the process of addressing this concern. In FY 2005 and 2006, EPA upgraded GRTS from a Lotus Notes-based system to an Oracle-based system. The primary purpose of this upgrade was to enable linking to various other data systems and to enable ease of movement of data from one system to another. We completed the upgrade to the Oracle-based system in 2006 and are now working on a large variety of linkages between the Oracle-based system and other prominent spreadsheet and database systems. We have established our priorities for doing this work in large part through detailed discussions with over 40 states in October 2006 at the national GRTS Users Group meeting. (We hold these meetings to assure that states receive adequate training in GRTS and to get feedback regarding needed improvements to GRTS.) Based on the needs established in the national meeting, we have tasked our contractor to do the following work during FY 07: a. Develop import/export capability for .xml files, to allow seamless import of data into GRTS. b. Develop import/export capability of .xls (Excel) files. c. Provide unique user IDs to all GRTS users to enable them to directly and easily access Business Objects reporting tools. d. Link GRTS to EPA's Financial Data Warehouse. e. If sufficient funding is available, we plan to also develop a data transfer process between GRTS and WebRIT. If not, this work would be done in FY08. This will be part of the modernization of the WebRIT application and will utilize Web Services technology to provide improved system performance.
All data entered into federal databases are separately reported	Eliminate written reports since data is available to EPA in its own databases	MT	**R8:** did not comment	Agree. Where data exists in a national database, every reasonable effort should be made by EPA to utilize that information instead of requesting double-entry onto

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in quarterly & annual PPAs (e.g., permits, inspections, compliance events)				paper reports.
Watershed permit issuance	Eliminate--not compatible with other permit system	NE	**R7:** disagrees because NE has no watershed permits	Agree. EPA will eliminate this measure beginning in 2008. However, we continue to be interested in collecting case studies to demonstrate the value of watershed-based permitting.
Permits providing for trading	Eliminate	NE	**R7:** there are no trading permits in NE, nothing to report	Disagree. Trading is an important initiative and tracking permits and facilities trading is helping to get this program off the ground. Currently, this information is collected by HQ staff working with regions and state partners. For GPRA, EPA agrees to only report on the number of dischargers that carry out trades.
Permitting for Environmental Results (PERS)	-- Eliminate PERS and associated reporting (NE) -- Duplicative of info in EnPPA (MN)	NE, MN	**R5:** supports MN's request to drop reporting **R7:** supports NE's request to drop report	Disagree. PERS-associated reporting is an important core measure used in most EPA management systems. While the PERS state program profile development was a one time activity, it resulted in important information about implementation of the Surface Water Program. The profiles identified challenges that permitting authorities must address to ensure the integrity of their programs, including NPDES, TMDL, WQS, etc. EPA continues to monitor implementation of state actions addressing those challenges and tracks progress through a GPRA measure. EPA HQ staff works with regions, who in turn work with states, to update progress in this area.
Report on % of POTWs that are beneficially reusing biosolids	Modify to require only % beneficially reused if data is useful; otherwise eliminate report	KS	**R7:** agrees, need to check w/HQ re value of report	OW has a different POTW measure.
Report on inspections of CAFOs on annual basis	Modify to treat CAFOs as other NPDES permittees	KS	**R7:** will discuss issue w/KS during workplan negotiations for the calendar year 2008 workplan.	This is a regional issue.

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Report on the status of SSO strategy annually	Eliminate--can discuss same during program reviews	KS	**R7:** agrees to eliminate written report but will work w/KS to determine SSO strategy	This is a regional issue.
Provide EPA with documents for review of all draft major/minor NPDES permits, including applications	Modify to include review of 10 permits/year. EPA can review others during program reviews. Since KS has been an authorized state since 1974, periodic program oversight and in-depth analysis of a select group or subset of permits should provide enough insight into the state's NPDES program.	KS	**R7:** disagrees. KS over-reports (re minor permits) but will accept electronic submission	This is regional requirement.
CWA 104 (b)(3) Wetlands Pilot Demonstration (WPD) Grants	--Duplicative reporting, switch to one annual report (ME) --Change to annual reporting (RI)	ME, RI	**R1:** agrees	--EPA agrees that grantees need not provide duplicative reporting to HQ. Grantees should follow the reporting schedule in their official assistance agreements, providing reports to the regional project officers. --In order for HQ to evaluate projects in a consistent manner, regions (not states) will be responsible for submitting a progress report to HQ in January of each year. HQ has asked regions to use the most recent progress report from the grantee in providing the HQ annual update. These yearly progress reports from the regions will serve to update HQ yearly about the status of WDP projects.
Non-point source report	--Report preparation is time-consuming and expensive (OK) -- Change quarterly report to annual (RI) -- Information already provided:	OK, RI, MA	**R1: --** quarterly reports no longer required (RI) --disagrees w/MA as they are NPM and OMB PART measures	Partially agrees. Requirements set in statute and regulation. Regions encouraged to work w/states to design reporting procedures to promote efficiency and eliminate duplication. Cannot merge discrete reporting requirements (Strategic Plan and PAM reporting are separate requirements and NPS measures are reported

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	duplicative data submission (MA)		**R6:** disagrees, report is useful and required by CWA; OK's report is too long and can be streamlined	based on OMB PART requirements).
Report on environmental benefits of every SRF loan including NP loans by watershed	Not necessary to track NP loans by watershed	IA	**R7:** has contacted HQ	Partially agrees. States, in an agreement w/GAD, can opt to provide data to CBR system to meet requirement of Jan. 2005 E.O., or include output/outcome measures in their applications for CWSRF capitalization grants.
Develop monitoring plan with water quality restoration schedule	Do not require water quality restoration results within the established schedule	MA	**R1:** disagrees, this is not an additional report	--EPA's waterbody restoration target is from EPA's strategic plan and PART commitments to OMB for the section 106 grant program, SRF program and EPA's internal water quality protection program. --As necessary, EPA and states need to adjust monitoring strategies and other program activities to achieve and document progress towards this long-term outcome measure.
Other Safe Drinking Water Reporting	--SNC report developed for capacity development: eliminate—redundant (FL)(1) --Clean Watersheds Needs Survey and Report to Congress: survey is useless to FL and burdensome; reduce duplicative data entry (FL)(2) --Provide resources to implement wet weather initiative (reporting and inspection) (VA) --Submission of public water system violations, enforcement actions, milestones to EPA's ODS: submission of violation	FL, WI, VA, TN, KY, IL, TX	**R3:** will follow-up to clarify VA's concerns, information requested is included in existing data entry in PCS. **R4:** --disagrees w/FL(1), there is no other source of SNC info --disagrees w/FL(2), survey necessary to support SRF grants -- disagrees w/TN(1), will work with the state; no comment (TN)(2) -- disagrees w/KY, report/analysis required by	--Partially agrees w/IL. OW attempting to reduce frequency by maximizing reporting fields in SDWIS, leveraging the data verification process, and hoping to reduce arsenic compliance reporting to twice yearly. --Disagrees w/TX, reporting is every 3 years, not every two years and HQ generates list every 3 years for the states in order to relieve some of the burden. --Agrees w/FL(2) re duplicative data entry; CWNS data system being modified to reduce duplicative data entry and make it more useful by integrating it w/several EPA data systems.

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	and enforcement data within 45 days of end of each quarter not reasonable (TN)(1) --Submission of public water system actions data (special reports) to EPA's ODS: electronic reporting should not be required--paper reports should be acceptable to EPA (TN)(2) -- Annual public water system compliance report data already provided to EPA (KY) -- Quarterly reports: SDWA non-compliance, arsenic rule compliance; change to annual (IL) -- Reduce frequency of capacity development/significant noncomplaince (SNC) reports (once every two years) (TX)(1) --Presenting mid-year/end-of-year PWSSP PPG report via hard copy and e-mail semi-annually to EPA burdensome. Recommends extending turn-around time and allowing for electronic submission. (TX)(2)		statute -- disagrees w/KY, region requires state to complete additional analysis **R5:** disagrees with reduction in frequency for arsenic reporting; HQ needs info to respond to Congressional inquiries (IL) -- re SDWA non-compliance, disagrees w/reduction in frequency but recognizes that lists contain same systems over many quarters. Region will work with IL to develop a mechanism that eliminates the need for repetitive reporting. **R6:** (1) disagrees w/TX, reporting is important	
CWA sec 106 & 604b workplans and status reports	Use spreadsheet format currently used by region for status reports as base document for workplans	PA	**R3:** agrees. R3 currently uses spreadsheet format as base document for workplans, but still requires narrative for status reports	This is a regional issue.
NPDES permit	-- Submission of permit issuance	MS,	**R4: --**agrees w/MS	Disagree. Facilities covered under general permits are

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backlog, Electronic Permit Issuing Forecasting Tool (E-PIFT)	forecasting tool to R4: eliminate—duplicative (MS) --E-PIFT (record permit backlog) duplicates information currently in PCS database (MN) --Permit counts, backlog/permit forecast statistics duplicative: info that is uploaded weekly in PCS should suffice (SC)	MN, SC	--agrees w/SC to limit reporting to PCS **R5:** agrees w/MN	not generally entered in PCS, so we have developed the E-PIFT system to capture that information. EPA will reduce this burden when the new system Permits Management Oversight System (PMOS) comes on line or we will allow use of PCS/ICIS-NPDES if the data is complete.
Reports that cover different reporting periods w/different frequencies	-- Reporting (in PPA, Strategic Plan Sub-objectives, PAMs, GRTS & NPS Annual Report): submit info in one format annually or semi-annually instead of multiple formats/deadlines (NJ). -- EPA requires reports that cover different reporting periods for no reason: reports are based on federal fiscal year, state fiscal year and calendar year (IA) --Reduce frequency (e.g., from semi-annual to annual) (MD)	NJ, IA, MD	**R2:** supports NJ's request to streamline water reporting requirements and willing to work w/NJ and OW to identify specific areas of overlap or redundancy. **R7:** IA's concern is not specific to grants but covers a broad range of reporting requirements. Further discussion on a program-by-program basis is needed to determine how to resolve issue.	Agrees with the general concept of better aligning or timing the reports and reducing the frequency of reporting, as appropriate.
Report on permit issuance, and compliance & enforcement measures for pre-treatment facilities	Reduce frequency from semi-annual to annual	CT	**R1:** disagrees, uses semi-annual report in enforcement and other important tasks	Disagrees. OW needs industrial user permit issuance to ensure that the Pretreatment Program is being implemented. In fact, the Pretreatment Program was the recent subject of an EPA IG investigation that recommended improved measures and data collection.
Web-based Reach Indexing Tool for Watershed Assessment	Upgrade to a more common program (e.g., ArcView) for efficient and effective data transfers	DE	**R3:** PCRIT can be directly uploaded to Reach Address Database and can be used with Arcview which eliminates need to use	--Other mechanisms are available that are better suited for dealing with large volumes of data. --Plans are being made to modernize WebRIT to take advantage of newer technology.

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Tracking and Environmental Results (WebRIT)			WebRIT.	
CWSRF NIMS Annual Report	Due date should be changed to end of calendar year to compensate for accounting entries completed at end of state fiscal year	UT	**R8:** non-issue due to misunderstanding between new state employee and R8 which has since been clarified and resolved.	Disagrees. Based on recommendations of almost all states providing CWSRF NIMs data, OW plans to collect data on July 1-June 30 fiscal year basis.
Duplicative reporting of TMDL project funding sources	R6 requires TX to duplicate info already in TMDL Quality Assurance Project Plans (QAPPS). Eliminate as R6 can review QAPPS to obtain funding source info	TX	**R6:** no comment	Partially agrees but still need to work on details on modifying summary tables to include info from work orders.
Documentation of TMDL program activities funded by CWA 106 grants	R6 requires TX TMDL program to copy and mail contract work orders semi-annually. Eliminate, info already provided to EPA through two summary documents.	TX	**R6:** disagrees and believes it has been flexible on reporting for 106 grants	Partially agrees but still need to work on details on modifying summary tables to include info from work orders.
National Estuary Program Grant Reporting	Consolidate semi-annual reporting into one report	TX	**R6:** doesn't address consolidation and discusses frequency instead	This is an R6 requirement. Okay, as long as it conforms to the NEP guidance.
NPDES 106 & 319 program report	Eliminate requirement of annual summary of quarterly reports--duplicative	MD	**R3:** will follow up with MD to clarify.	This is not an OW issue. R3 would need to address the quarterly report issue.